

**PLAINTIFF'S EXHIBIT 1**

**From:** Rick Blanke

**Sent:** Wednesday, January 6, 2021 11:20 AM

**To:** 'Anderson, Kelley' <andersonke@stlouis-mo.gov>; 'raimondoa@stlouis-mo.gov' <raimondoa@stlouis-mo.gov>

**Cc:** Paul Schmitz <pschmitz@ugbbllaw.com>

**Subject:** RE: James Garavaglia v City of St. Louis & Darlene Green, Case No. 4:20-cv-01681-CDP, In the US District Court for the Eastern District of Missouri

**Importance:** High

Mr. Anderson,

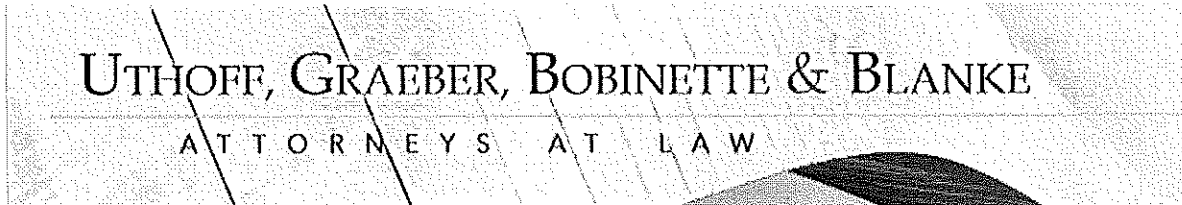
I am in receipt of your motion for extension of time to respond to our 1<sup>st</sup> Amended Complaint.

While I did state that "after [our amended complaint] is filed, we will certainly not object to an extension of time to plead after your voluntary entry of appearance" {see below, emphasis supplied}, I don't believe I ever specifically consented to an additional 60 days. That is a tad excessive, don't you think?

As you know, federal court tracking system deadlines and case management orders are based at least in part on the date of filing. Extending the time for your response an additional *two months* will unnecessarily squeeze all parties regarding such upcoming deadlines (*especially* if you intend to file any motion(s) to dismiss). I think a 2-3-week extension would be more reasonable.

Please advise if you voluntarily amend your request or if I must respond to your motion as set forth herein. Thank you.

Richard B. Blanke



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